

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ENTEGRIS, INC.,	)	
	)	Consolidated Cases
Plaintiff,	)	
	)	
v.	)	Civil Action No. 03-10392-GAO
	)	
PALL CORPORATION,	)	
	)	
Defendant.	)	
	)	
PALL CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-10887-GAO
	)	
ENTEGRIS, INC. ,	)	
	)	
Defendant.	)	
	)	

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Pursuant to Local Rule 16.1(g) and Fed. R. Civ. P. 16(b), Plaintiff Entegris, Inc. ("Entegris") and Defendant Pall Corp. ("Pall") jointly move the Court for an extension of all pending discovery deadlines in accordance with the schedule set forth below:

	<b>Previous Deadline</b>	<b>New Proposed Deadline</b>
Close of Fact Discovery	12/15/09	03/31/10
Joint Claim Chart Of Agreed-Upon Terms, Disputed Terms For Construction and Proposed Constructions To Be Filed	01/15/10	04/30/10
Parties' Opening <i>Markman</i> Briefs	02/12/10	05/28/10
Responsive <i>Markman</i> Briefs	03/12/10	06/28/10
Reply <i>Markman</i> Briefs	03/26/10	07/12/10
Prehearing Statement	04/12/10	07/30/10
<i>Markman</i> Hearing	04/29/10, 2 p.m.	08/16/10, 2 p.m. or on a date soon thereafter at the convenience of the Court

As the basis for the requested extension, the parties state as follows: The parties have made substantial progress in discovery. To date, Entegris has produced over 70,000 pages and Pall has produced over 1.2 million pages. The parties intend to substantially complete the production of documents by December 15, 2009. Despite this progress, the parties require an extension of time in order to properly review the documents and conduct depositions. Therefore, the parties jointly request a three-and-one-half month extension to the existing schedule to permit the completion of depositions and any other remaining fact discovery.

Thus, the parties respectfully submit that good cause exists to amend the scheduling order and respectfully request that this Court enter the agreed upon schedule as proposed herein.

<p>ENTEGRIS, INC. By its attorneys,</p> <p><u>/s/ Stuart W. Yothers</u> John T. Montgomery BBO# 352220 Dalila Arguez Wendlandt BBO# 639280 Ropes &amp; Gray LLP One International Place Boston, Massachusetts 02110 (617) 951-7000</p> <p>Stuart W. Yothers BBO# 662450 Ropes &amp; Gray LLP 1211 Avenue of the Americas New York, New York 10036 (212) 596-9000</p>	<p>PALL CORPORATION By its attorneys,</p> <p><u>/s/ Gary R. Greenberg</u> Gary R. Greenberg BBO# 209420 Louis J. Scerra BBO# 543600 Greenberg Traurig LLP One International Place, 3<sup>rd</sup> Floor Boston, MA 02110 (617) 310-6000</p> <p>Mark E. Phelps H. Michael Hartmann L. Scott Beall Leydig, Voit &amp; Mayer, Ltd. Two Prudential Plaza, Suite 4900 Chicago, IL 606601-6780 (312) 616-5600</p>
Dated: December 3, 2009	Dated: December 3, 2009

**Certificate of Service**

I hereby certify that, on December 3, 2009, true and correct copies of the Joint Motion To Modify Scheduling Order filed through ECF will be sent electronically to counsel for the Defendant Pall Corporation who are registered participants as identified on the Notice of Electronic Filing.

/s/ Stuart W. Yothers  
Stuart W. Yothers BBO# 662450